

December 20, 2024

VIA ECF

Hon. Victoria Reznik
United States Magistrate Judge
United States District Court for the Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: Graham et al v. Vassar College, No. 7:23-cv-07692

Dear Judge Reznik:

The parties submit this joint status letter pursuant to the Court's instructions during the October 15, 2024 case management conference and the Minute Entry, dated October 16, 2024 (ECF No. 59).

Discovery. Plaintiffs and Defendant both served and responded to one another's written document requests before the initial status conference in this matter. Defendant also served interrogatories before the conference, to which Plaintiffs also responded. Since the conference, Plaintiff Wendy Graham also served her First Set of Interrogatories on Defendant, to which Defendant responded. Finally, on November 5, 2024, the parties exchanged initial disclosures. The parties have met and conferred to try to resolve any disagreements on these responses, and continue to do so.

The parties also prepared a proposed Protective Order and proposed ESI Protocol for this case. Following resolution of final pending revisions, the parties will submit both documents to this Court for approval. Once they have been entered, the parties are prepared to exchange productions of confidential and highly sensitive documents, data, and ESI, subject to the Protective Order and ESI Protocol.

Settlement. There have been no discussions of settlement since the parties' October 10, 2024 case management statement. See ECF No. 58 at 2.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Maria Papasevastos

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